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7 [Proposed] Lead Counsel for Plaintiffs
8

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 SOUTHERN DIVISION

12 FRED JEAN, Individually and on
Behalf of All Others Similarly Situated,)

13 Plaintiff,)

14 vs.)

15 STEC, INC., et al.,)

16 Defendants.)
17

No. SACV-09-01304-JVS(MLGx)

CLASS ACTION

DECLARATION OF DARREN .
ROBBINS IN SUPPORT OF
PENSION FUND GROUP'S MOTION
FOR APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF
SELECTION OF LEAD COUNSEL

DATE: February 8, 2010
TIME: 1:30 p.m.
COURTROOM: 10C
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1 I, DARREN J. ROBBINS, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the
3 State of California and this Court. I am a member of the law firm of Coughlin Stoia
4 Geller Rudman & Robbins LLP, counsel for Building Trades United Pension Trust
5 Fund and Electrical Workers Pension Fund, Local 103 I.B.E.W. (together the
6 “Pension Fund Group”) and proposed lead counsel for the class.

7 2. I make this declaration in support of the Pension Fund Group’s Motion
8 for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel. I have
9 personal knowledge of the matters stated herein and, if called upon, I could and would
10 competently testify thereto.

11 3. Attached are true and correct copies of the following exhibits:

12 Exhibit A: Notice of pendency of class action published on *Business*
13 *Wire*, a national business-oriented wire service, dated
14 November 6, 2009;

15 Exhibit B: Sworn Certifications of Building Trades United Pension Trust
16 Fund and Electrical Workers Pension Fund, Local 103 I.B.E.W.;

17 Exhibit C: Joint Declaration of Building Trades United Pension Trust Fund
18 and Electrical Workers Pension Fund, Local 103 I.B.E.W.;

19 Exhibit D: Chart of Pension Fund Group’s Purchases and Losses; and

20 Exhibit E: Firm résumé of Coughlin Stoia Geller Rudman & Robbins LLP.

21 I declare under penalty of perjury under the laws of the United States of
22 America that the foregoing is true and correct. Executed this 5th day of January,
23 2010, at San Diego, California.

24 s/ DARREN J. ROBBINS
25 DARREN J. ROBBINS

26 S:\CasesSD\STEC\Lead Plaintiff\DEC00063900_LP_McCormick.doc

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CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Service List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 5, 2010.

s/ DARREN J. ROBBINS
DARREN J. ROBBINS

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Mailing Information for a Case 8:09-cv-01304-JVS-MLG

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Lionel Z Glancy**
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- **Michael M Goldberg**
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)